



Mr R Body  
Borough Green Sand Pits Ltd  
Platt Industrial Estate  
St Mary's Platt  
Borough Green  
Kent TN15 8JL

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Ask for: Jim Wooldridge  
Your Ref:  
Our Ref: KCC/PRE/TM/0147/2015  
Date: 22 May 2015

Dear Mr Body

**REQUEST FOR PRE-APPLICATION PLANNING ADVICE: PROPOSED  
EXTENSION TO BOROUGH GREEN SAND PIT, PLATT INDUSTRIAL ESTATE,  
ST MARY'S PLATT, BOROUGH GREEN, KENT, TN15 8JL**

I refer to your request for planning advice (dated 11 May 2015) in respect of the above and our subsequent meeting with Messrs Connolly and Chaffe on 18 May 2015. I am writing to provide written advice on this matter in accordance with our Planning Advice Charging Guide (April 2011). The advice is based on discussions during our meeting and my understanding of the planning permissions and issues at Borough Green Sand Pit and Park Farm Quarry (including further consideration of various matters since our meeting).

Summary of proposed development

The proposed development would involve the extraction of approximately 150,000 tonnes of sand and restoration by infilling with inert waste to pre-existing levels on approximately 0.7 hectares of land to the north of Borough Green Sand Pit and south of public footpath MR251/3. The proposed development would be worked as an extension to Borough Green Sand Pit with access obtained through that site using existing facilities. Extraction and infilling would take place as an additional phase to the current workings and would be undertaken within the time period currently being sought for the completion of working and restoration at Borough Green Sand Pit (i.e. cessation of sand extraction by 31 December 2022 and completion of restoration by 31 December 2025).

(Continued)

## Background

Park Farm Quarry: Planning permission for the extraction of sand and clay at the proposed site already exists by virtue of planning permission TM/02/2663/MR97 (dated 3 March 2003). However, the permission does not allow infilling using materials from outside sources (condition 14). The site known as Park Farm Quarry has not been worked for several years and previously supplied clay to Halling Cement Works (now closed). The proposed site lies in the south west corner of Park Farm Quarry within an area defined in the permission as outlined in yellow on drawing P1/1782/2. The proposed site and rest of the area outlined in yellow has not yet been worked.

A number of other conditions imposed on planning permission TM/02/2663/MR97 are of relevance. These include the following:

- Condition 1(a) only allows clay and sand to be worked.
- Condition 1(c) restricts working to no deeper than 79.04m above ordnance datum (AOD) unless a new scheme of working has been submitted to and approved by the County Planning Authority (KCC) (any such scheme would need to demonstrate water levels and provide at least a 2m stand-off above the water table).
- Condition 2(a) requires extraction to cease by 21 February 2040 and restoration to be completed within 2 years of the completion of extraction or by 21 February 2042 (whichever is the earlier).
- Condition 2(b) states that extraction of clay for the purposes of implementing interim restoration in the area edged blue on drawing P1/1782/2 shall cease on or before 31 December 2007 and the interim restoration completed in accordance with condition 22.
- Condition 3 states that access must be via the existing entrance to Park Farm Quarry and through the Platt Industrial Estate.
- Condition 5 restricts the maximum number of HGV movements to 320 each week (160 in and 160 out).
- Condition 8 requires a new scheme of working, restoration and aftercare to be submitted to and approved by KCC before any operations take place in the area outlined in yellow on drawing P1/1782/2.
- Condition 9 imposes similar restrictions to condition 8 in respect of another part of Park Farm Quarry identified as being outlined in blue on drawing P1/1782/2 in so far as this relates to the extraction of sand.
- Condition 14 states that no filling materials from outside sources shall be imported to the site.
- Condition 22 requires the area outlined in blue to be restored in accordance with the interim details submitted by letter dated 20 November 2002 and drawing numbers P1/1782/3/1 and P1/1782/4/1. This provides for the satisfactory restoration of the area outlined in blue in the event that no sand extraction takes place in that area.
- Condition 24 required a scheme of woodland management for an area edged green on drawing P1/1782/2 to be submitted to KCC for approval and thereafter be implemented as approved. A scheme was submitted and was approved on 6 September 2004.

- Condition 27 required an aftercare scheme to be submitted for the area outlined in blue to be submitted within 12 months of the date of the permission and for the scheme to be implemented as approved.
- Condition 30 requires an archaeological watching brief to be undertaken and for any items of interest and finds to be recorded in accordance with a written programme and specification approved by KCC.

There is also a planning application (TM/08/2869) that has yet to be determined by KCC which seeks a variation of condition 22 of planning permission TM/02/2663/MR97 to allow amendments to the previously approved interim restoration scheme for the area outlined in blue. The application also includes an aftercare scheme required by condition 27. As a result of a number of issues that arose as a result of consultations and my own consideration of the application, I had requested that the applicant (former owner Cemex UK Operations Ltd) address a number of matters on 28 August 2008. As no substantive response was received I again requested that these matters be addressed or that the application be withdrawn on 25 February 2009. I sent further letters on 4 August 2009 and 23 May 2012 seeking updates and the withdrawal of the application. No responses were received. The need for this issue to be addressed has also been highlighted in a number of site monitoring reports.

Borough Green Sand Pit: There are two main planning permissions which provide for the extraction of sand and restoration involving by infilling with inert waste to something similar to pre-extraction levels at Borough Green Sand Pit. These are planning permissions TM/09/2028 (dated 4 December 2009) and TM/07/512 (dated 3 June 2008). Planning permission also exists for soil blending at the site (TM/07/3101 dated 3 June 2008). Approval was given pursuant to conditions 24 and 27 of TM/09/2028 and conditions 39 and 40 of TM/07/512 for schemes of detailed restoration and landscape planting and aftercare, maintenance and management relating to the entire site on 8 September 2010.

Applications have recently been submitted to extend the life of the entire site until the end of 2025 (TM/15/777 and TM/15/781) although these have yet to be determined. An application has also been submitted (and is yet to be determined) for the relocation of the soil blending operation (TM/15/775).

All of the existing permissions include conditions that restrict or otherwise control development in some way. These include those that relate to days / hours of working, access, HGV movements, waste types, noise limits, dust mitigation, soil resources, groundwater protection, surface water drainage, ecology, landscaping and archaeology. If the current applications are permitted, similar conditions are likely to be included on any new planning permissions.

There is also a Section 106 Agreement (dated 30 May 2008) relating to the site. It was secured prior to the issue of planning permission TM/07/512 and includes provisions in respect road improvements, public rights of way, groundwater monitoring, a Code of Safe Operating Practice, the maintenance and management of landscape planting for 10 years after completion of the last landscape / aftercare requirement and KCC's costs. It is likely that a further Section 106 Agreement

addressing a number of these issues will again be required if planning application TM/15/781 is to be permitted.

### **Key planning considerations which need to be taken into account in preparing any planning application**

The key planning considerations (in no particular order) include:-

- The principle of the proposed development;
- The need for the mineral and inert waste disposal capacity;
- The implications for Park Farm Quarry;
- Groundwater protection;
- Surface water impacts;
- Geotechnical stability;
- Landscape and visual impact;
- Biodiversity and geological interests;
- Cultural heritage / archaeology issues;
- Public rights of way;
- Health and amenity impacts (e.g. noise and dust / air quality);
- Highways and transportation;
- Cumulative impact; and
- Restoration, aftercare and afteruse.

Informal and without prejudice officer comments on each of these issues is included in the relevant section below.

#### Details to be submitted with the application:

The application should be submitted using the minerals or waste application forms and certificates which are available on the County Council's web site. Guidance on the submission of minerals and waste applications is also available. Regardless of which forms you use, consideration should be given to the Validation and Local Information requirements for waste developments. The forms, certificates, validation checklist and associated guidance are available via the following web link:-

<http://www.kent.gov.uk/waste-planning-and-land/planning-applications/apply-for-planning-permission>

I would welcome the opportunity to discuss and agree how many paper and / or CD copies of the application documents will be provided prior to the application being submitted.

#### The Development Plan:

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the development plan unless material planning considerations indicate otherwise. In this instance, the relevant development plan documents are the Kent Minerals Local Plan Construction Aggregates (December 1993), the Kent Waste Local Plan (March 1998), the

Tonbridge and Malling Borough Council Local Development Framework (LDF) Core Strategy (September 2007) and the Tonbridge and Malling Borough Council LDF Managing Development and the Environment Development Plan Document (April 2010). Material considerations include the National Planning Policy Framework (March 2012), the National Planning Policy for Waste (October 2014), the Planning Practice Guidance (March 2014 and regularly updated), the Kent Minerals and Waste Local Plan 2013-30 Submission Document (July 2014), the Kent Mineral Sites Plan Preferred Options Consultation (May 2012) and the Kent Downs Area of Outstanding Natural Beauty (AONB) Management Plan 2014-2019 (April 2014). The Kent Minerals and Waste Local Plan 2013-30 is currently the subject of an Independent Examination and it is likely that it will be subject to modifications. I would therefore suggest that you check the latest position on the KCC web site before relying on associated content.

#### Other issues:

The proposed development constitutes “Schedule 2 development” by virtue of paragraph 2 sub-paragraphs 2(a) and 11(b)(ii) of Schedule 2 to the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (SI 2011 No. 1824) (“the 2011 Regulations”) because it is for a new quarry with a site area of no more than 25ha and for the disposal of waste on a site exceeding 0.5 hectares. The site is not within a “sensitive area” as defined in paragraph 2(1) of the 2011 Regulations. The indicative screening criteria and thresholds set out in the EIA Planning Practice Guidance (PPG) indicate that EIA is more likely where a new quarry covers an area of more than 15ha or involves the extraction of more than 30,000tpa of mineral. In terms of key issues to consider, the PPG states that the likelihood of significant effects will tend to depend on the scale and duration of the works, and the likely consequent impact of noise, dust, discharges to water and visual intrusion. The indicative screening criteria and thresholds set out in the EIA Planning Practice Guidance (PPG) indicate that EIA is more likely for Installations (including landfill sites) for the deposit, recovery and/or disposal of household, industrial and/or commercial wastes where new capacity is created to hold more than 50,000 tonnes per year, or to hold waste on a site of 10 hectares or more. Sites taking smaller quantities of these wastes, sites seeking only to accept inert wastes (demolition rubble etc.) or Civic Amenity sites, are unlikely to require Environmental Impact Assessment. In terms of key issues to consider, the PPG states that these should include the scale of the development and the nature of the potential impact in terms of discharges, emissions or odour.

Given that the proposed development would represent a small extension to the existing quarry and that the void would be backfilled in a phased manner using inert waste, I am satisfied that it would not be likely to give rise to significant effects or impacts such that I believe that it is unlikely that EIA would be required. Notwithstanding this, if you wish to establish KCC’s formal opinion on this matter you should submit a screening request under Regulation 5 of the EIA Regulations.

#### **The need for specialist input**

Appropriate specialist / technical input will be required to provide the necessary supporting information for the application.

Direct contact with relevant officers from KCC Highways and Transportation, Landscape, Biodiversity, Archaeology and Sustainable Drainage may help to ensure that the application contains all the necessary information to enable it to be assessed and assist in ensuring that any unacceptable elements are avoided where possible. If you wish to discuss these matters with KCC specialists please let me know and I will provide contact details. If you wish to discuss noise, dust, air quality or geotechnical / stability issues, it will be necessary for you to speak to KCC's external consultants. I must advise you that any discussions with KCC's consultants are likely to incur costs that would need to be borne by you in accordance with the table on page 2 of the Planning Advice Charging Guide (April 2011). If there are any issues that you wish to discuss in this way please let me know and I will endeavour to facilitate it.

I would also recommend that you discuss the proposals with the Environment Agency. Other groups or individuals with specific technical knowledge that you may also wish to contact prior to finalising any application include Tonbridge and Malling Borough Council (Environmental Health), South East Water, Natural England and Kent Wildlife Trust.

**Informal and without prejudice officer advice on the planning merits including an indication if the proposal will be completely unacceptable or not**

The principle of the proposed development

The Park Farm Quarry planning permission provides for the extraction of sand and clay from the proposed extension area but requires this to be done through and as part of working at Park Farm Quarry. In addition, it could only take place after a new scheme of working, restoration and aftercare has been submitted to and approved by KCC. The permission does not allow materials from outside sources to be imported and used for restoration or other purposes. These and other restrictions imposed on the permission mean that it cannot be relied upon for the development you propose. It will therefore be necessary for you to submit a full application and obtain a fresh planning permission for the proposed development. Notwithstanding this, the Park Farm Quarry permission clearly establishes the principle of sand and clay being worked from the proposed extension area and I would suggest that this be clearly referenced as part of any new application.

You suggested during our meeting that the working of the proposed area as an extension to Borough Green Sand Pit may be the only realistic way of extracting the sand given constraints associated with seeking to do this via Park Farm Quarry. Assuming that to be the case, the proposed development would be likely to attract in-principle support given that it would make best use of a finite natural resource. If the sand is extracted from the proposed extension area, infilling with inert waste to pre-existing levels would be consistent with the restoration requirements at Borough Green Sand Pit. It would also provide some additional inert waste landfill capacity.

Additional planning policy support for extraction of sand from the proposed extension area is provided by Policy CA6 of the Kent Minerals Local Plan Construction Aggregates (December 1993) given that it lies within an Area of Search identified in the Plan (see Proposals Map Inset H). Policy W12 of the Kent Waste Local Plan

(March 1998) supports proposals for landfill where this would assist in the restoration of mineral working which would benefit (in planning terms) from being returned to as near as possible original ground levels. Similar policy support can be found for infilling mineral workings in the emerging Kent Minerals and Waste Local Plan.

The proposed extension area lies in the Green Belt. Mineral extraction need not be inappropriate in the Green Belt provided it preserves openness and does not conflict with the purposes of including land in the Green Belt. It has previously been accepted that the working and restoration of Borough Green Sand Pit is acceptable in Green Belt terms. Provided high standards of working and restoration are proposed, I consider this likely to be the case again in respect of the proposed extension area.

#### The need for the mineral and inert waste disposal capacity

Although you suggested that the proposed development would only provide for the extraction of approximately 150,000 tonnes of sand, it would serve to contribute (albeit in a small way) to meeting the need for minerals in Kent. The resultant void would also contribute to inert waste landfill capacity (although such additional capacity is not identified as being required in the emerging Kent Minerals and Waste Local Plan). Subject to the quantities of indigenous clay required for restoration purposes within the proposed extension area, elsewhere within Park Farm Quarry or within Borough Green Sand Pit, it is possible that limited amounts of clay may be available for export if demand exists and if permission is obtained for its removal. Support for any clay exports would be conditional on it not being needed or used more effectively within Park Farm Quarry or Borough Green Sand Pit for restoration of other purposes. The application should address these issues.

#### The implications for Park Farm Quarry

During our meeting I indicated that I would expect any application to consider the implications of the proposed development for Park Farm Quarry and address any outstanding issues (either as part of the same application or alternatively submitted at the same time and appropriately cross-referenced). I specifically mentioned the need for the interim restoration of the area outlined in blue on drawing P1/1782/2 to be dealt with. As noted above, the former owner (Cemex UK Operations Ltd) sought to amend the previously approved interim restoration scheme for that area but this was never determined and the area remains unrestored. Assuming that further mineral working at Park Farm Quarry is unlikely to take place, it would assist if this and the associated reasons could be set out in the application.

Having revisited the matter since our meeting, I remain of the opinion that this should be addressed although I note that condition 22 does not actually include a date by when interim restoration should be completed. However, condition 23 is clear that restoration should be progressed as each phase of mineral extraction is completed and condition 2(b) states that extraction of clay for the purposes of implementing interim restoration in the area outlined in blue on drawing P1/1782/2 shall cease on or before 31 December 2007 and the interim restoration completed in accordance with condition 22. I believe that the intention was that the interim restoration of the

area edged blue would be undertaken soon after the cessation of clay in that area in 2007.

My preferred approach would be for application TM/08/2869 to be withdrawn by Mr Connolly and for revised proposals for the interim restoration of the area outlined in blue to be submitted with appropriate aftercare proposals for that area. This should also be accompanied by a timetable for implementation and a revised woodland management plan for the area edged green to replace that approved pursuant to condition 24 on 6 September 2004. Whilst it may be difficult for KCC to require these actions at this time, given the precise wording of the relevant conditions, it would assist in demonstrating the overall acceptability of the proposed development if they were to be addressed. I would be happy to discuss the former revised interim restoration proposals, including the reasons why I was unable to support them as submitted, if this would assist.

Given that the amended interim restoration for the area outlined in blue was being dealt with as part of an application submitted under Section 73 of the Town and Country Planning Act 1990 (as amended), it would be consistent if that approach was followed again once the current application (TM/08/2869) is withdrawn. However, it may now be possible for this to be dealt with in other ways. It could potentially be dealt with via a non-material amendment application under Section 96A of the Act or, if the new proposals for the area outlined in blue are to be regarded as the final restoration of that part of the site, by an application seeking the approval of KCC pursuant to condition 8 of the Park Farm Quarry permission (TM/02/2663/MR97). Whichever approach is adopted, similar information and drawings would be required. Appropriate aftercare proposals should be submitted pursuant to either condition 8 or 27 of TM/02/2663/MR97 (depending on the proposed status of the restoration) and the revised woodland management plan included for approval under condition 24. As noted above, these matters could either be dealt with as part of the same application for the proposed extension or separately. I would be happy to discuss this further once you have decided on whether to submit an application if this would assist.

#### Groundwater protection

Groundwater protection will be a key issue for consideration and will need to be comprehensively addressed as part of any new application (both in terms of mineral extraction and restoration involving infilling with inert waste). Given your experiences in working Borough Green Sand Pit (particularly in respect of issues associated with obtaining an Environmental Permit for the northern extension and the proximity of the site to South East Water's pumping station and abstraction boreholes) and my comments on the related requirements for mineral working in the Park Farm Quarry permission, I believe that you are sufficiently familiar with those issues relating to groundwater protection that I need not go into further detail in this letter. However, I would strongly recommend that you ensure that the Environment Agency is likely to support the issue of an Environmental Permit before progressing any planning application. If you wish to discuss these issues further please let me know.

### Surface water impacts

Surface water issues will also be important considerations and will need to be comprehensively addressed as part of any new application. Again, I believe that you are familiar with existing surface water drainage issues in so far as these relate to Borough Green Sand Pit and the surrounding land. Any application will need to demonstrate that surface water flows would be maintained and managed and not adversely affected or give rise to problems elsewhere. Of particular importance will be the stream / drain passing between the existing northern extension and the proposed extension areas and the relationship between this, its water catchment and any impacts downstream (either within Borough Green Sand Pit or further south). Consideration should also be given to the ponds just to the north and west of the proposed extension area as part of this work. Any proposals to relocate the stream / drain (temporarily or permanently) as part of the development will need to be clearly explained and demonstrated to be acceptable.

### Geotechnical stability

The application would need to consider the potential implications of the proposed development on land stability and demonstrate that this would not lead to unacceptable adverse impacts. Particular regard would need to be given to the integrity of public footpath MR251/3 and those using it and the stream / drain immediately adjacent to the proposed extension.

### Landscape and visual impact

As with any application, landscape and visual impacts will be important considerations. In this case the site is relatively close to the Kent Downs AONB and would involve the loss of woodland / trees. The application should be accompanied by a Landscape and Visual Impact Assessment. The application should also include appropriate landscaping and restoration proposals which reflect local landscape character and the permitted restoration at Borough Green Sand Pit. Consideration could usefully be given to advance planting on land immediately to the north of the proposed extension area to replace existing woodland that would need to be removed to enable extraction to take place and to the restoration of the land to woodland to complement that which would be retained at Botany Wood to the east and north east. Whilst I do not believe that the proposed extension area contains or is immediately adjacent to any protected trees or ancient woodland, this should be checked and any implications addressed as necessary in the application.

### Biodiversity and geological interests

Although the proposed extension area does not appear to be subject to any ecological or geological designations, this should be checked and any implications addressed as necessary. The application will need to be supported by an appropriate ecological assessment and any necessary surveys. As many ecological surveys can only be undertaken at specific times, this could have implications for the timing of any application. I therefore recommend that you seek the advice of a suitably qualified ecologist in respect of this. The proposed restoration should be designed to result in no net loss of biodiversity and, ideally, improvements.

### Cultural heritage / archaeology issues

As noted above, the Park Farm Quarry permission requires an archaeological watching brief to be undertaken and for any items of interest and finds to be recorded in accordance with a written programme and specification approved by KCC. No such scheme has been approved. Whilst it may be that similar archaeological requirements would apply to the proposed extension area as already apply to the northern extension area, I would suggest that you contact KCC Archaeology to agree the necessary extent of any cultural heritage or archaeological work that may be required before any application is submitted and if planning permission is granted.

### Public rights of way

Consideration will need to be given to potential impacts of public footpath MR251/3 and its users. The footpath will need to be retained on its current alignment at an appropriate width or diverted in some way if this cannot be satisfactorily and safely achieved. In addition to land stability (noted above), potential impacts could include those associated with noise, dust and visual impact.

### Health and amenity impacts (e.g. noise and dust / air quality)

Potential impacts such as noise, dust, emissions and air quality will need to be addressed as part of the application in order to establish whether the proposed development accords with relevant planning policies and is acceptable in all other respects. I would suggest that as the proposed site would be worked as an extension to Borough Green Sand Pit, the relevant controls associated with that be reviewed and amended as necessary as part of any application.

### Highways and transportation

Assuming that the proposed extension is worked as an additional phase to Borough Green Sand Pit and the permitted number of HGV movements each day and overall timetable for completion of operations are not exceeded, I consider it unlikely that there would be a highway objection to the application. However, you may wish to discuss this with KCC Highways and Transportation before submitting any application. It is worth noting that subject to the various requirements of the Park Farm Quarry permission being satisfactorily addressed (e.g. the submission and approval of new schemes of working, restoration and aftercare), operations at that site could take place simultaneously with those at Borough Green Sand Pit leading to a greater number of overall HGV movements each day using the access through the Platt Industrial Estate onto the A25. Condition 5 of the Park Farm Quarry permission restricts the maximum number of HGV movements to 320 each week (160 in and 160 out) but has no limit on any one day. HGV movements at Borough Green Sand Pit are restricted to 60 each day (30 in and 30 out). Whilst KCC may seek to further restrict HGV movements in some way to reduce impacts on any one day if it is required to consider any further approvals relating to the working of Park Farm Quarry, the principle of the weekly limit and associated HGV numbers has already been established. You may wish to consider the implications of this before making any application.

### Cumulative impact

Consideration should also be given to any cumulative impacts relating to other existing, permitted or proposed development in the area. Given the relatively small size of the proposed extension area, as this would be worked in a phased manner as part of Borough Green Sand Pit and assuming that no extraction takes place simultaneously elsewhere within Park Farm Quarry, I think it unlikely that cumulative impacts associated with mineral working and restoration would be unacceptable. However, you would need to consider this and other types of the development in order that potential cumulative impact can be properly assessed.

### Restoration, aftercare and afteruse

Satisfactory restoration and the provision of appropriate aftercare and afteruse are essential. This includes appropriate proposals for soil stripping, handling, storage and replacement. A particular issue needing to be addressed in this case is how the land would be restored and used alongside the restoration, aftercare and afteruse provided for by the Borough Green Sand Pit permissions and associated Section 106 Agreement and any proposals for Park Farm Quarry. It is possible that a further Section 106 Agreement may be required to extend the existing obligations relating to Borough Green Sand Pit to the proposed extension.

### Other issues

Consideration should also be given to potential impacts on the permitted working, restoration and aftercare at Borough Green Sand Pit. Amended working, restoration and aftercare proposals would need to be prepared and submitted to demonstrate how the proposed extension area would be worked alongside the rest of the site. A new phasing plan will be required and there could be a need for consequential amendments to the permissions at Borough Green Sand Pit. I would suggest that you give careful consideration to these issues. I would be happy to discuss these matters further once the preparation of any new application has been progressed.

### **Advice about the Council's development control (management) process including consultation processes, likely timetable of consideration and estimation of decision date or Planning Application Committee date where applicable**

The fee for the planning application would be based on either Category 10 (1) (i.e. the winning and working of minerals) or 12 (a) (1) (i.e. the use of land for the disposal of refuse or waste materials) of Part 2 of the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012. In either case, this would currently be £195 per 0.1 hectares (ha) (rounded up to the nearest 0.1ha).

There is an expectation that an application of this type without an EIA would be determined in 13 weeks. However, there is no guarantee that this will be possible. Factors that may influence the time required for determination include the adequacy of the submitted details, the time that key consultees take to respond, the need or

otherwise to obtain additional information from the applicant or others and committee cycles. As well as consulting a range of relevant parties, it would be necessary to advertise the application by newspaper and site notice and to notify neighbouring businesses and residents. In the event that material planning objections are received, the application would need to be reported to the County Council's Planning Applications Committee for determination.

### **Suggested pre-submission consultation with stakeholders**

I would suggest that consultation take place with stakeholders at an early stage and before any proposals are finalised. Given the relatively small size of the proposed extension and as it would be worked through and as part of Borough Green Sand Pit I believe that stakeholder engagement with the local community could reasonably be limited in this case to those living immediately adjacent to the existing site and its access and representatives of the Parish, District and County Councils. In addition, I would strongly recommend that you discuss any proposals at an early stage with the Environment Agency, South East Water and any other individual or group with a specific interest in the area. The pre-application engagement could usefully be recorded and summarised as part of any application that is submitted.

I hope that this information is of assistance in preparing any application. Please let me know if you wish to discuss further.

Yours sincerely

**Jim Wooldridge**  
**Principal Planning Officer**  
**For Head of Planning Applications**